

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

PRISON LEGAL NEWS, as project)
of the HUMAN RIGHTS DEFENSE)
CENTER,)
Plaintiff/Counter-Defendant,)
v.) No. 3:15-CV-452-TAV-CCS
JAMES "J.J." JONES, Sheriff of Knox)
County, Tennessee, in his official and)
individual capacities;)
RODNEY BIVENS, Assistant Chief)
Deputy of the Knox County Sheriff's)
Office, in his official and individual)
capacities, and KNOX COUNTY,)
TENNESSEE,)
Defendants/Counter-Plaintiffs.)

Stipulation

1. All parties stipulate and agree that Defendants James J.J. Jones and Rodney Bivens should be dismissed from this case in their individual capacities, on the merits and with prejudice.
2. Plaintiff and Knox County stipulate and agree that Plaintiff sustained compensatory damages in the amount of \$25,000.00 and that summary judgment against Knox County should be granted in that amount.
3. Plaintiff and Knox County stipulate and agree that this stipulation resolves all claims against all defendants except for Plaintiff's claims for injunctive relief and attorneys' fees and costs pursuant to 42 U.S.C § 1988, which are reserved.

Stipulated and agreed this 26th day of June, 2017.

/s/ Tricia R. Herzfel
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Attorney for Defendants

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

/s/ Tricia Herzfeld
Tricia Herzfeld (BPR No. 26014)